



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JJD:JLG
F. #2020R00632

*610 Federal Plaza
Central Islip, New York 11722*

September 6, 2024

By Federal Express and ECF

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Re: United States v. Arevalo-Chavez, et al.
Criminal Docket No. 22-429 (JMA)

Dear Counsel:

Enclosed please find the government's supplemental discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. The government also renews its request for reciprocal discovery from the defendants.

The enclosed materials, which have been stamped with control numbers 089894 through 092903, are designated as *Sensitive Discovery Material*, which are being provided pursuant to the August 17, 2023 Stipulation & Order (ECF Dkt. No. 58).¹ These materials consist of the following:

¹ As of August 22, 2024, all counsel have executed this stipulation.

1. An Incident Report from the Marin County Sheriff's Office, dated May 8, 2017, reflecting transcriptions and draft translations² of certain digital files containing the "MS-13 Testament," or bylaws (stamped 089894 – 089925).
2. Wilas (prison kites) obtained in November 2020 from the Ministerio de Justicia y Seguridad Pública (MJSP) of El Salvador (stamped 089926 – 090001).
3. Draft transcriptions and translations of consensually-recorded and monitored calls and text-messages made by a confidential source at the direction of the Federal Bureau of Investigation (FBI) (stamped 090002 – 090014, 090610 – 090615, 092615 – 092627, 092703 – 092716, and 092717 – 092734).
4. Linesheets and draft translations of intercepted calls obtained by La Fiscalía General de la República (FGR) CITE (wire center) in El Salvador, for target lines 310-941-7922 and 732-213-8184 (stamped 090015 – 090609, 090616 – 092614, and 092628 – 092702).
5. Draft transcriptions/translations of seized wilas (stamped 092735 – 092824).
6. Wilas and analysis reports from MJSP provided to the FBI in February 2021 (stamped 092825 – 092874).
7. FBI Cryptanalysis and Racketeering Records Unit laboratory report, dated March 18, 2021, and related documents and records (stamped 092875 – 092889).
8. Wilas sent in approximately September 2022 (stamped 092890 – 092903).

² Please note, any transcripts and/or translations of documents or audio recordings provided in discovery by the government prior to a hearing or trial that are not marked "final" are draft transcripts/translations that are being provided at this time for the convenience of the defendant(s) and defense counsel, and which are intended to be used only for the purposes of hearing and trial preparation, and for no other purpose. By accepting these documents, you agree that such draft transcripts/translations will not be used in any way at any proceeding to conduct cross-examination of any witness or to impeach or call into question the accuracy of any final transcript or translation.

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact the undersigned government counsel.

Very truly yours,

BREON PEACE
United States Attorney

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Enclosures

cc: Clerk of the Court (JMA) (by ECF) (without enclosures)